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11 Attorneys for Defendant
12 MONA DAGGETT

13
14 **IN THE UNITED STATES DISTRICT COURT**
15
FOR THE NORTHERN DISTRICT OF CALIFORNIA

16
17 LANE BAULDRY,
18 Plaintiff,

19 v.
20 TOWN OF DANVILLE, COUNTY OF CONTRA
21 COSTA, CITY OF PIEDMONT, Government
22 Entities, MONA DAGGETT, CHRISTOPHER
23 BUTLER, DEPUTY STEPHEN TANABE,
24 DEPUTY TOM HENDERSON, SERGEANT
ANDY WELLS and DOES 1 to 50, inclusive,

Defendants.

Case No.: 3:12-cv-03943-CRB

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
FURTHER EXTENSION OF TIME
FOR DEFENDANT MONA DAGGETT
TO ANSWER TO PLAINTIFF'S
THIRD AMENDED COMPLAINT**

25 Plaintiff Lane Bauldry ("Plaintiff") and Defendant Mona Daggett ("Daggett") (collectively
26 the "Stipulating Parties") hereby stipulate as follows:

27 WHEREAS, after the Court issued an order on April 23, 2013 granting in part and denying in
28 part the motion to dismiss of defendants Sergeant Andrew Wells and the City of Piedmont, Plaintiff
filed the "Third Amended Complaint for Damages, for Violations of Civil Rights and Other
Wrongs" (hereinafter "TAC") on June 3, 2013;

29 WHEREAS, pursuant to joint stipulations including, most recently, the joint stipulation dated
30 August 29, 2014 and this Court's related order which was signed and filed with the court on
31 September 4, 2014, Daggett's current deadline for answering the TAC is September 5, 2014;
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33 //

1 WHEREAS, since Plaintiff filed the TAC, the Stipulating Parties have continued to discuss
2 this action and have agreed to extend the deadline for Daggett to answer the TAC to, and including,
3 September 12, 2014;

4 WHEREAS, an extension of time for answering the TAC is supported by good cause as it
5 will not prejudice any party to this action and does not interfere with any court-mandated deadlines;

6 THEREFORE, the Stipulating Parties request that the Court extend the deadline for Daggett
7 to answer Plaintiff's TAC from September 5, 2014 to, and including, September 12, 2014.

8 **IT IS SO STIPULATED.**

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10 Dated: September 5, 2014

DUANE MORRIS LLP

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12 By: /s/ Allegra A. Jones
Allegra A. Jones
13 Attorneys for Defendant
MONA DAGGETT

14
15 Dated: September 5, 2014

THE HALEY LAW OFFICES

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17 By: /s/ Matthew Haley
Matthew Haley
18 Attorneys for Plaintiff
LANE BAULDY

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20 ATTESTATION: Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the
21 filing of this document has been obtained from each of the other signatories thereto.

22 **ORDER**

23
24 **IT IS SO ORDERED.**

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26 Dated: _Ugr vgo dgt": ."4236, 2014



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28 JUDGE OF THE U.S. DISTRICT COURT